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Dear [REDACTED]

Stroud Local Plan Review Regulation 18 Consultation: Emerging Development Strategy
Stagecoach West response

Stagecoach West is pleased to offer its response to the current consultation, and I submit our representations in the format and in the order sought by the consultation document. By all means let me know if you would prefer them to be re-submitted in a disaggregated form, to assist processing them.

Question 1.0a

Have we identified the top 5 issues for you?

We see no clear reason why the local plan should constrain itself to only five main strategic issues. While clearly the plan needs to be focused and clear in what it attempts to achieve, and why, there is no obvious rationale, nor any other requirements set out in the National Planning Policy Framework (NPPF) or Planning Practice Guidance, that plan makers should restrict the consideration of strategic issues and objectives to just five points.

The NPPF makes clear at paragraph 102 that transport issues should be considered from the earliest stages of plan-making and development proposals, so that, among other things:

“d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.”

The consultation document makes clear that a wide range of other respondents, apart from ourselves, have serious concerns about the potential that the plan strategy will exacerbate existing chronic traffic congestion problems in parts of the plan area. While the extent, duration and nature of the congestion cannot be compared with the largest Metropolitan areas in the country, there are significant parts of the network where traffic congestion now represents a serious and chronic problem.

These include:

- Stroud town centre, and in particular the links between Dr Newton's Way and Painswick Road, and the main junctions and their approaches. Merrywalks lies at the centre of this part of the network, and this of course is the main bus interchange within the district.
- Cainscross Road, particularly in the morning peak and at school closing time, given that several major schools are accessed from it.
- Stratford Road, which is one of the more important approaches to the town centre for a number of bus routes including services 63 from Gloucester, and the main town service 67
- the area around the Cross Keys roundabout, South of Quedgeley within Hardwicke parish. This represents the key southern approach to Gloucester from junction 12 of the M5 motorway, but it is equally important on the inter-urban bus network. Committed development at Hunts Grove and potential future further strategic allocations for housing and employment will add further pressure onto both the local and strategic highways network in this area. Among many other things, it is vital the traffic congestion does not impact the safe and efficient operation of the Strategic Road Network (SRN) through queueing on the B4008 leading to stationary traffic accumulating on the M5 off slips at junction 12. It is equally vital that bus services, including future improvements to inter-urban routes running through the area, make efficient progress at all times, if the local plan strategy is to benefit from attractive or relevant and effective public transport options.
- At and around M5 junction 13, West of Stonehouse. We are aware that work is about to commence shortly on major improvements to the A419 in this area funded by the Gloucestershire Growth Deal, at and between the motorway, Chipman's Platt and Oldends Lane. We recognise this will make significant improvements to traffic conditions in this area at peak times, and will create considerable capacity headroom to accommodate further development in the immediate vicinity. However it will remain important to ensure the network flows freely in and around this area, given that a much higher level of bus service is anticipated to meet the needs of committed development at Great Oldbury, even before new allocations are made through the Local Plan Review.

It is important that the local plan puts at its heart the need to ensure the development strategy does not lead to deterioration in traffic conditions, and, at least as important, make sure that the transport effects of development lead to net environmental gains as far as possible. Quite apart from the economic and social costs of congestion, which particularly severely felt by bus passengers, congestion is the single biggest cause of road traffic -related environmental pollution, and in particular, ambient levels of nitrogen oxides and particulate matter, which are known to be especially harmful to health.

Without both traffic congestion and the need to secure a much higher use of sustainable transport modes being identified as key issues for the plan to address, it is highly unlikely that the plan will either be sufficiently ambitious or effective in this policy area, and as a result of that, there may be some quite material questions as to how far the plan can be considered sound, having regard to the need set out in NPPF for plans to demonstrably represent an evidenced sustainable development strategy for the area.

Question 1.0b

Do you agree with the ways we intend to tackle these issues?

Of the Main Issues identified in the emerging option consultation document, we broadly agree that the approaches to address issues 2-5 inclusive are appropriate and likely to be effective.

We set out below, our advice on how the identified Main Issue 1 might be better expressed to ensure that both the overarching strategy, and specific allocations and policies to support it, is effectively delivered.

Issue 1

It is clear that the public transport network will need to evolve significantly over the plan period. Some of the changes and improvements to bus services that will take place in future are demanded by committed development, in particular in support of the current strategic allocations at Great Oldbury (West of Stonehouse) and at Hunts Grove.

We have already made clear that we recognise the need for further strategic development to take place in locations that may not be immediately adjacent to the main existing urban areas within the district. Such locations might well not benefit today from frequent or particularly attractive public transport choices. As we have pointed out in previous representations, there may nevertheless be very significant opportunities for thoughtfully located new settlements, or expanded villages, to catalyse very substantial improvements to public transport connectivity, including in areas where service frequency and range of destinations is today very limited. We have pointed to the A38 corridor as representing an area of search where these opportunities are most likely to be identifiable and deliverable.

Therefore, we urge the Council to amend the narrative behind the plan strategy as follows:

*“concentrating housing development at locations where there is currently **or potentially** the best possible access by public transport, walking and cycling to services, facilities, jobs and infrastructure”;*

Question 2.1a

Do you agree with the ways in which the emerging Strategy intends to support the local economy and the creation of jobs?

Broadly, Stagecoach agrees that the emerging option proposes a comprehensive and effective set of approaches to support sustainable economic development within the district, and ensure that the economic and social potential of the area is appropriately realised to the fullest possible extent.

Stagecoach particularly welcomes the fact that the plan is looking to align the locational strategy for employment and housing. This will mean that, on the one hand, new jobs are likely to be created in close proximity to a significant number of new homes, in particular within the larger strategic allocations that will be made. Secondly, by co-locating both employment and housing allocations, a greater critical mass of demand is likely to be generated both into and out of new developments, significantly assisting in the creation of economically viable higher quality bus services.

Question 2.1b

Do you support an alternative approach?

Or have we missed anything?

The emerging option has not identified the crucial importance that sustainable transport modes play in ensuring that patterns of development are socially and economically inclusive. This is especially important in a district like Stroud, where despite generally high levels of prosperity and economic participation, there are significant pockets of significant deprivation and social exclusion. Unlike many more urban districts, the density and range of public transport options is rather more limited.

This makes it very much more important that the plan actively seeks to ensure that employment allocations are made in locations that are well served by sustainable transport options, and public transport in particular.

Question 2.2a

Do you agree with the ways in which the emerging Strategy intends to support the District's town centres?

Given rapid social and economic changes, this is a matter where a degree of flexibility is no doubt essential.

However it is vital never to lose sight of the fact that town centres are currently strongly protected by national policy precisely because they clearly represent the most accessible parts of district by sustainable modes. This is strongly reflected in NPPF at chapter 7 where the sequential test for the so-called "town centre uses" remains very much in place.

Accordingly the review of the local plan should ensure as far as possible that each town/city centre retains its existing important function as the most sustainable location for the very wide range of land uses that generate high volumes of journeys, defined within NPPF as town centre uses. While we recognise that the requirements for this have greatly reduced overall, the scale of growth anticipated by the current plan and no doubt by the review, means that this should include land for appropriate expansion of retail and leisure facilities. Of these, suitable sites within Stroud town centre are likely to be the most significant.

Accessibility of town centres by bus is vital to retain their overall vitality attractiveness and commercial viability as venues. Specific compelling evidence on this matter exists within the County, jointly commissioned by GCC and Stagecoach, which we can provide on request, quite apart from very recent evidence at national scale.

Both strategic policies and land-use allocations must ensure that convenient and efficient access to the main town centres by bus is at least retained and if possible enhanced. Improved bus priority and roadside facilities serving Stroud town centre are urgently needed, if bus services are to play the fullest possible role in meeting travel needs not just within the town, but across the wider district, for which Stroud represents a significant public transport hub.

The JCS should seek to set clear and specific strategic policies for the town centres that achieve these aims, not least following from and fully aligning with the evidence that is brought forward

during the plan-making process in due course to ensure that overarching mode shift targets are achieved, and that all the opportunities to meet wider objectives to improve quality of life, and secure quality place-making while improving wider connectivity and socio-economic integration across the plan area, are clearly identified and demonstrably deliverable.

There is clearly an opportunity to provide more high density housing within the town centres, in accordance with NPPF paragraph 85 f), not least to meet a range of housing needs for smaller households, including but not restricted students and younger people, in highly sustainable locations, aligning excellently with the requirements of NPPF paragraph 102-103, but also policies that seek to accommodate higher densities of development close to major public transport hubs, to achieve a highly sustainable pattern of development with exceptionally high levels of use of active and sustainable travel options .

Notwithstanding this, in so doing, great care needs to be taken to ensure that the interface between public transport services and operations (including high concentrations of footfall and the needs of waiting passengers) with existing and proposed land uses, does not lead to inappropriate conflicts. If any significant levels of new housing are to be accommodated in town centres, a clear and robust evidence base should be used to steer such development, potentially supported by non-strategic policies set out in Supplementary Planning Documents to the most appropriate locations.

Question 2.2b

**Do you support an alternative approach?
Or have we missed anything?**

Stagecoach considers the approach proposed to be both well considered and comprehensive.

Question 2.3a

Do you agree with the ways in which the emerging Strategy intends to meet local housing need?

Stagecoach agrees that the plan can and should seek to meet the annualised housing quantum arising from the national methodology to assess local housing requirements. It is clear that the need for a sufficient supply of new homes in Stroud district is no less than in other parts of the south-west, or the wider South of England. Indeed we note the evidence quoted within the consultation document that suggests that house prices are rising faster within the district than they are within many adjoining areas, which represents a very clear market signal that housing delivery rates within the district need to rise over recent levels.

However in seeking to meet these needs, it is important that the plan strategy does not dilute or undermine a sustainable pattern of development, in its approach to providing sites to meet the affordable housing requirement in rural areas, or in the identification of sites specialist housing, including self building. The opportunities to develop in rural areas, while still offering a credible range of sustainable travel choices, are relatively limited. The plan should maintain a clear focus on directing affordable housing delivery in particular to rural locations which benefit from a reasonable range of sustainable travel options, including public transport, to ensure that all residents are able to

play the fullest possible role in the life of the district, including its economy, without the need for each adult to have access to a car.

Question 2.3b

**Do you support an alternative approach?
Or have we missed anything?**

Stagecoach believes that for the plan to be effective and justified, and remain in conformity with NPPF policy, there needs to be a clear statement in policy that “exception sites”, whether for first-time buyers, renters, or social housing, will be preferentially supported in those settlements that benefit from an hourly or better bus service.

It is essential that in providing for the full range of local housing needs, including affordable housing in rural parts of the district, the exception sites policy suite does not in effect create a “backdoor” to development outside the plan led system, where the cumulative quantum of development arising in the smallest Tier 4 and 5 settlements could potentially amount to several hundred units which would be almost entirely dependent on the car.

In settlements where this level of service does not exist, we would suggest that the total level of development should be restricted to less than five dwellings per settlement, to avoid a dispersal policy for rural affordable housing arising by default, with major deleterious impacts on the long term ability of residents of these homes to access employment, training, and other services.

Question 2.4a

Do you agree with the ways in which the emerging Strategy intends to protect existing or deliver new local green spaces and community facilities?

We recognise the high level of value ascribed to the natural environment within the district, commensurate with its ecological importance and attractiveness, and reflected in a wide variety of planning and other ecological designations.

We note the ambition in the plan to provide a new Canal link between Stonehouse and the Berkeley Canal at Saul junction. This represents a very significant and ambitious infrastructural investment, which no doubt will have a variety of benefits, including a further improvement in the district’s attractiveness for leisure and recreation. However, national experience shows that such investments are hard to fund, and that relative to cost, the benefits are hard to quantify.

It will be especially important to ensure that the funding of this project does not end up diverting resources of all kinds from other essential infrastructure that will be required to support sustainable patterns of growth, and in particular sustainable transport set out in the local plan.

In fact, we are a little concerned that there are no equally ambitious but more deliverable measures set out in the consultation document that seek to radically improve the efficiency, attractiveness and relevance of public transport, walking and cycling, especially when compared with personal car use.

Question 2.4b

**Do you support an alternative approach?
Or have we missed anything?**

Stagecoach has no further comment to make on this area.

Question 3.1a

Do you agree with the vision for 2040 as drafted?

There is a great deal to welcome in the currently drafted local plan vision for 2040. With a full 20 years between likely adoption and the local plan horizon, it is possible to align investment and development strategies across a very wide number of themes and across a large number of organisations and stakeholders, to achieve very substantial positive changes, and in many respects the vision reflect this.

However, as we have set out in response to question 1, the plan currently lacks any real clarity of vision or ambition to deliver much more inclusive and sustainable patterns of movement and accessibility, despite the fact that national policy expects it to.

Question 3.1b

Do you support an alternative?

We would urge the plan's vision to be amended to include the following statement:

*"Our District supports a network of market towns, well connected to **one another and their rural hinterlands and complementary to the role of wider regional centres and employment clusters with high quality, efficient public transport.** Each contributes to our sustainable and thriving local economy."*

*"We enjoy a high quality of life within our healthy, vibrant and diverse **rural communities, which have a strong sense of their own identity and local distinctiveness, providing as far as possible for their own needs and well-connected to facilities, employment and greenspace assets by public transport, walking and cycling infrastructure and services.** – from Wotton-under-Edge in the south, to Stroud Town in the centre and Upton St. Leonards in the north. They are all safe and secure places, where vulnerable people are supported."*

Question 3.2a

Do you agree with the Strategic Objectives as drafted?

Stagecoach welcomes, and broadly supports the general tenor and thrust of the Strategic Objectives.

However, much of the phrasing would benefit from being a much more tightly aligned to achieving specific outcomes. It is important that each Strategic Objective expresses a clear goal, and moves beyond expressing only general aspirations. In so doing, each Strategic Objective ought to be able to expressly deliver outcomes against the identified Main Issues that the plan is seeking to address.

This then creates a much clearer narrative and rationale against which specific policies and allocations can be formulated and assessed. As currently drafted, this is not consistently the case.

Question 3.2b

Do you support an alternative approach?

Or have we missed anything?

Following from the above comments, we would suggest strongly that the Strategic Objectives are amended along the following lines:

Strategic Objective SO1: Accessible communities

Maintaining and improving accessibility to services and amenities, and materially enhancing the opportunities for public transport, walking and cycling to support the delivery of with:

- *Healthcare for all residents*
- *Affordable and decent housing for local needs*
- *Active social, leisure and recreation opportunities*
- *Youth and adult learning-employment, education and training opportunities*

Strategic Objective SO4: Transport and travel

Promoting healthier the delivery and uptake of effective alternatives to the use of the private car and seeking to reduce congestion and CO2 emissions by using facilitating shorter journeys, lower carbon modes, more efficient use of roadspace, active travel and/or smarter choices, working towards a safer, more efficient and more integrated transport system to improve access to local goods and services, whether through proven or new technologies.

Strategic Objective SO5: Climate Change and environmental limits

Promoting a development strategy that mitigates global warming, adapts to climate change and respects our environmental limits by:

- *Supporting a pattern of development that facilitates the preferential use of sustainable modes of transport*

Question 4.2a

Do you support the broad approach of the emerging growth strategy, in terms of distributing the growth required by national policy for Stroud District?

Stagecoach broadly supports the overarching approach of the emerging growth strategy, which we recognise reflects both the opportunities and constraints facing the Council as it seeks to arrive at an appropriate development strategy for the district.

We are keen to commend the approach being taken by Council officers, where an iterative approach is being taken to formulate and test both broad approaches and key potential elements in the strategy. We consider this eminently prudent, especially because it is clear that it is no longer appropriate to roll forward strategies that served the district well in the past. Faced with the need to look at the matters concerned from first principles, it is important to the Council does not jump to premature conclusions.

We note and strongly endorse the conclusion drawn by the sustainability appraisal exercise undertaken to review the appropriateness of the four broad options.

It is no surprise to us that Options 1 and 2 represent the strategies that perform best in sustainability terms. The concern would be that the credible options delivering growth adjoining Stroud of the largest town in the district, and Dursley as the second-largest, do not exist on any great scale. This then points towards the West, away from the AONB, and towards smaller settlements at Cam and Stonehouse. These places are far less constrained. However, there exist natural and other physical constraints on potential sustainable growth.

It is clear to us that Option 3, while probably representing a very low risk in terms of delivery, represents a highly unsustainable pattern of development with extended journey distances and few if any credible alternatives to exceptionally high levels of car dependency.

We also would strongly agree with the broad conclusion made concerning Option 4, that a single new growth point risks being exceedingly car –dependent. However, we disagree profoundly with the conclusion that sheer scale is sufficient to lead to the mitigation of this tendency. The correct approach would be to recognise that the location of one or more new growth points represents the means by which the delivery of credible sustainable travel choices can be achieved.

What is apparent from the options presented in the consultation document, is that the majority of growth in the district can indeed be sustainably accommodated at all very close to the larger settlements in the district. If proximity to Gloucester is also factored into the evaluation from first principles, in the absence of any policy requirement to seek to meet some of Gloucester’s own housing need within the district, then it looks possible that Stroud could meet most if not all of its needs using a combination of Options 1 and 2, without recourse to a new settlement or dispersal to smaller settlements.

However, this does not appear to be what the consultation document is recommending. Rather, it proposes something that looks rather like a combination of all four strategies. In so doing, it is far from clear that a truly sustainable, deliverable development strategy is achievable.

We welcome that the emergent strategy proposes significant development adjacent to Gloucester, Stonehouse and Cam, as the largest settlements where suitable land for development can be identified. These sites are all either currently or potentially well served by high quality relevant public transport, whether rail or road-based, or both. It is logical but the plan should seek to roll forward existing local plan allocations in Stroud and Brimscombe.

However, we are perplexed that an existing local plan allocation at Hunts Grove that was originally made to help meet housing need arising in Gloucester, now seems to be intended to meet that arising in the district more broadly. Stroud District Council is already well aware that Gloucester City is unable to meet its own housing requirements within its boundaries, and that suitable sites including at Hardwicke within Stroud District have been judged to offer some of the demonstrably most sustainable options to address this need. Irrespective of whether it is agreed that these potential sites should meet Stroud or Gloucester’s needs, or a combination of the two, there is a

significant risk that in due course much or all of the quantum identifiable on sites on the edge of Gloucester City will ultimately need to be hypothecated towards meeting the latter's needs, thus requiring further sites to be found within the district to meet Stroud's requirement. We would have expected at this stage for Stroud and Gloucester to be arriving at some conclusions about what quantum is required to be met within Stroud, to allow this point to be resolved.

Option 2 demonstrates the capacity of a wider range of sites to accommodate a significant quantum of growth. Some of the sites, most notably North West of Stonehouse, clearly can identify a deliverable quantum that exceeds what has been taken forward in the emergent preferred option. We struggle to understand why options that have contributed to the best consolidated performance in the initial high level sustainability appraisal have been reduced in scope or entirely removed in the emerging preferred option. In fact, this seems to be no clear means by which potential sources of housing land supply have been introduced into the preferred option, for example through a ranking exercise.

The emerging preferred option also includes a range of sites in relatively small settlements which simply do not justify strategic allocation. An excellent example would be the allocation of merely 20 units in Painswick, representing an annualised delivery of just one home per annum across the plan period. We welcome the fact that most of the settlements represented in the preferred option do at least offer an hourly bus service to a larger centre, the very minimum level of service that we would consider represents a credible travel choice. However, the plan seems to be embarking on a strategy that would tend to spread the delivery of housing quite broadly, rather than concentrating it in locations that could be made highly sustainable, if they are not already. We agree with and would support the principle that limited amounts of housing need to be identifiable in more sustainable smaller settlements, predominantly to meet local needs, not least that for affordable housing, and to help maintain the vitality of the broad range of local services as well as the local community. However, we believe that a criterion-based policy would achieve this end by steering rural exception sites to such settlements.

Two entirely new settlements are proposed in the emerging preferred option. This reflects the broad option outlined in Option 4. We agree strongly that smaller new settlements are likely to be most appropriate, by virtue of their deliverability and their ability to respect the social and environmental character of the district. As we have said previously, a single large new settlement doesn't in and of itself achieve sustainability by virtue of its size. We also recognise, as does the initial Sustainability Appraisal that any new settlement risks being highly car -dependent. However, this is not inevitable either. New and expanded settlements cited on existing or potential high-quality public transport corridors can represent some of the most sustainable possible options for any development strategy, as we have pointed out in our previous representations to the Issues and Options consultation.

We welcome that the plan has highlighted the opportunity for a new settlement just North of Cam at Wisloe. As we have strongly suggested, new settlements cited on the A38 would be likely to catalyse a step change in the quality of public transport options on this key corridor, with the potential option to improve sustainable travel choices across the boundary into South Gloucestershire. The site already lies adjacent to a mainline rail station at Cam, but also served by

existing bus services between Dursley and Stroud. One service continues beyond to Wootton. We see clear potential to consolidate and greatly augment the bus service frequency on this corridor, directly serving the site. The proximity of the Wisloe promotion both to existing committed development at Cam and Draycott, and additional development proposed within the plan, also helps create a critical mass of demand in the corridor that will help sustain improvements in the short term, subject to appropriate levels of revenue funding being available to pump prime the considerable additional operating costs in the short term.

We have made clear our grave concerns about the inherent unsustainability of development on a strategic scale in the Berkeley and Sharpness area. No site in this vicinity can take advantage of any clear opportunity to provide a relevant sustainable transport choice. In fact, it is clear from the maps set out within the consultation document just how remote Sharpness is not only from major centres of employment outside the district in South Gloucestershire and around Gloucester City, but its relative distance from larger towns within the district.

A new settlement of just 2000 homes in this location comes nowhere near the size threshold sufficient to justify the commercial operation of even an hourly bus service to Stroud, which would require two vehicles in the operating cycle, even if the demand arising from current population in the immediate area is also factored in. In reality, travel demands from the site will be split across a number of relatively distant journey destinations, such that there would be an insufficient critical mass of demand for passenger transport on any corridor. The relative proximity of junction 14 on the M5, which is itself highly constrained, would make commuting by car a very likely option for most residents, given that it is impossible to conceive that a sufficiently frequent or direct public transport offer could be sustained from the site.

At the same time, at 2000 dwellings, the development is much less likely to be able to achieve any significant level of self-containment, particularly with regard to education and local retail. While changes in patterns of employment would support a greater level of home working, we see no way in which larger scale or more formal employment would be attracted to this location. Certainly, such a development would support a primary school and a modest amount of convenience retail and service provision commensurate with the size of the settlement, including perhaps a primary care hub, dependent on the current disposition of NHS services in the wider area. This itself has not been subject to any clear further investigation.

The costs of operating a rail-based solution (assuming there is a straightforward way of integrating a Sharpness to Cam branch line into the mainline rail operation to the East) will greatly exceed that of a bus- or coach-based solution. We note the promoters of a Sharpness new settlement believe they can deliver a “tram-train” link to Cam, where presumably travellers would change onto conventional services. No technical evidence that this can be achieved has been offered, or, at least some level of endorsement from the rail sector that this concept is worth further investigation.

Stagecoach is the only current UK operator of tram-train services, on a trial basis, in South Yorkshire. It has taken well over a decade to reach this point, taking advantage of an existing passenger rail line, following exhaustive evaluation and significant capital expenditure. The population density on

the line between Sheffield and Rotherham, via the regional shopping centre at Meadowhall, is an order of magnitude greater than that found in this plan area.

Very considerable capital costs would be involved to upgrade and rehabilitate the existing rail infrastructure to Sharpness. Merely creating a new station to serve the new development would itself run into a cost of several millions, even assuming a single platform and no need for any overbridges. Much greater would be the level of investment needed to provide for an interchange at Cam station. Here, it would be necessary to upgrade the existing station, opened in 1994, to operate as an interchange, something that has never previously been intended or envisaged. Existing facilities are extremely limited. Amongst the most costly interventions would be the need to provide an overbridge meeting current disability access standards. Platform extension would also probably be needed, though this may already be justifiable to serve development in the immediate vicinity, and likely increases in demand expressed station over the plan period.

Even if such a service were to be technically achievable, it is highly unlikely that more than a single vehicle could operate on a single track line, reducing the effective frequency greatly. The change of trains required at Cam would significantly extend journey times, and the combination of these two factors would mean that the generalised journey time of the options suggested by the promotional document would well exceed that which would be credible and marketable as an alternative to private car use. In short then, we consider that the Sharpness new settlement option on this or any scale represents inappropriate development on a site that is both currently unsustainable and cannot be made sustainable.

We see no evidence provided to support the inclusion of a new settlement at Sharpness in a sustainable development strategy for the district, and its continued inclusion is in every sense unjustified and quite anomalous. Its allocation simply does not follow from the evidence presented in support of the emerging preferred option.

To summarise therefore, Stagecoach believes that the emerging preferred option is headed largely in the right direction, but with the need to refocus the strategy more securely on a compact form of development, the demonstrably identifies and takes advantage of the opportunities available to secure the highest possible level of use of public transport, walking and cycling, to be in compliance with NPPF paragraphs 102-105 inclusive.

Question 4.2b

Do you support an alternative strategy approach?

Stagecoach would urge the Council to ensure that the main site options being considered for allocation consistently and rigorously evaluated with respect to their ability to take advantage of, or catalyse, the opportunities to provide frequent, direct, reliable and relevant public transport services. In a relatively rural district such as this, such opportunities are far from ubiquitous, and we believe that this should be considered, and expected to be a consideration but carries very great weight in the selection of appropriate development sites.

We believe that all sites within the Hardwicke Parish, and at Upton St Leonards, need to be evaluated with a view that they should accommodate housing needs arising from the city, rather than from the district itself. The consultation document, in its comments on Upton St Leonards, makes plain that these settlements function in effect as part of the city. It does not follow from the evidence that the sites are appropriate to meet housing needs arising within the district as a whole, at least at a time when the city itself is struggling to meet its own requirements.

Options 1 and 2 highlight significant potential adjacent to Draycott and North West of Stonehouse, that both have been taken forward into the emergent preferred option. While we support this strongly, it is important that the sites play the fullest possible role in meeting housing need in the district, to avoid the need for dispersal to less sustainable locations to a great extent.

We see that the Council accepts that land North West of Stonehouse could accommodate 800 dwellings. The site lies within immediate walking and cycling distance of both existing employment, and potential further allocations around junction 13 of the M5, that the Council is considering. Should it prove possible to deliver a new railway station on the Bristol to Birmingham line, and aspiration long-held in the County and district, then this too would be immediately accessible to the site. Even without this in place, Stagecoach is committed to providing at the minimum, a direct bus service linking the immediately adjoining land to Stonehouse and Stroud town centres in one direction and to Gloucester in the other, operating at least every 30 minutes. A substantial further allocation here could be expected to help sustain a more attractive operating frequency, while also being sufficiently close to major destinations on the line of route for bus journey times to be reasonably competitive with driving. We understand that the promoter believes that up to a thousand dwellings might be accommodated in this area without breaching environmental or other limits. We also understand that modelling work has been undertaken that demonstrates that following committed improvements to the A419 between M5 junction 13 and Oldends Lane, sufficient capacity will exist to accommodate this level of growth without the operation of this part of the network being in any way compromised. Assuming this can be further substantiated, this would suggest to us that this area of search should be preferred over all other options, and accordingly that the maximum sustainably achievable capacity of the site should be realised.

The next most sustainable set of options lies around Cam and Dursley (including Draycott). The existing railway station lies a short distance off the A4173 along which the key bus corridor runs. We already divert most journeys on the relevant services into turn in the station car Park which a small facility is provided. The sustainability of this location is already been recognised by a substantial allocation within the current local plan, which is now on the point of being delivered. In addition, currently unallocated land has been consented in the immediate vicinity of the station, including one site that the Council has put forward as a discounted option, somewhat confusingly. The combination of existing committed development, the current employment and housing allocation, the current level of service at the railway station at the opportunity to achieve a greater critical mass of housing and employment through further allocations in this area weighs strongly in favour of promotions in this area. As a result, we would have expected to see the capacity of suitable available and deliverable sites in this area taking full advantage of and while mostly this seems to be the case, we find it perplexing that sites immediately adjoining Cam station are not being positively considered for allocation.

We recognise that retaining existing allocations on previously developed land at Brimscombe makes sense, following on from the key issues and the key objectives of the plan in its current drafting. However a note of caution needs to be injected about both the sustainability and deliverability of the sites. Public transport options in this part of the district are relatively weak reflecting the limited hinterland of demand that bus services in this corridor can take advantage of. Our service 61 operates only every hour along this route and we see no clear case to improve this based on current or foreseeable demands. Steep valley slopes and relatively poor bus stop infrastructure on what is a very constrained but busy major road corridor further undermine the attractiveness of bus use. The sites concerned are technically challenging on a number of levels, no doubt, and this is reflected in the fact that to date they have not been brought forward. Relying on these sites within the housing trajectory for the first five years at least may well be ill-advised.

We support the identification of a new settlement at Wisloe. It is possible this site and adjoining land parcels might accommodate a larger quantum of development, and we believe that should be explored. Among other things, this might be necessary to help deliver appropriate improvements to access and connectivity in the immediate area, including improved access to Cam station from the West, and removal of traffic from the existing Hamlet at Cambridge, through the provision of a diversion to the A38 accommodating through traffic.

While we do not see evidence to suggest Sharpness is an appropriate location for large-scale development, we do believe that there are likely to be other appropriate options worthy of investigation for a new or expanded village on the A38 corridor, probably to the North of Cambridge. One such opportunity may well lie at or near Whitminster. Significant improvements to the bus service along the A38 between Gloucester and Stroud are already committed, and these could be further consolidated by further development in the broad corridor. There are clear constraints in terms of landscape, floodplain, topography, and access in this area, as well as the existing character of the village, that would evidently need to shape what might sustainably be achieved. The village itself already offers a number of local services, which initial phases of development could take advantage of. West End Lane already offers potential for a preferential link for sustainable modes directly to existing and likely further development East of the M5, avoiding junction 13 entirely, and potentially offering a very credible means to rebalance local patterns of travel towards sustainable modes.

Question 4.2c

Have we identified the right towns and villages for growth? Or do other settlements have growth potential?

We suggest Whitminster or a site relatively nearby might have potential to accommodate growth on a larger scale. A number of sites currently under promotion within and adjoining the village, some of which have potential to accommodate a very substantial level of growth, including making provision for employment. The village lies within very close proximity of existing employment to the North, on the southern fringes to Gloucester, and to the East in the Oldends Lane area of Stonehouse. The consultation document also indicates that the motorway junctions will be the focus for future allocations to meet additional employment land requirements.

Public transport provision in Whitminster is currently modest. However, substantial improvements will take place associated with committed development at Great Oldbury, West of Stonehouse. This will provide an additional half hourly service connecting Whitminster directly to Stonehouse and Stroud, and equally directly to Gloucester via Quedgely. In so doing, the village will benefit from a level of public transport accessibility that is amongst the highest in the district, whether measured in terms of service frequency or bus journey times to key local destinations.

The A38, as a former trunk road, is substantially over-engineered for its current purpose. Very substantial amounts of carriageway are currently hatched out. Careful re-purposing of these areas of pavement would be likely to offer the potential for extensive lengths of bus and cycle priority both to the North, on the approach to the Cross Keys roundabout, and through and past the village to the South. Grove Lane is an existing highway link between the A38 and committed and potential development East of the M5. There may be significant potential to provide a sustainable transport link taking advantage of this road, while removing through vehicular traffic, especially if Land South of Grove Lane were to be identifiable for development. This being the case, there are very substantial opportunities for development in this area to take advantage of sustainable transport, substantially reducing the likely reliance on the car, while also delivering a pattern of development that is consistent with the proposed overarching development strategy for the District.

The role of the A38 in structuring the most appropriate pattern of development at or around Whitminster is clearly very important. Currently the village essentially lies to the West of the road. Some opportunities lying to the West of the A38 might afford the opportunity for public transport to more directly serve both existing and future residents, with the delivery of a bus priority spine running through them. This would continue to rejoin the A38 via School Lane, which would then potentially continue seamlessly towards Stonehouse via Grove Lane.

We note that there are no clear opportunities to deliver new homes at Wotton-under-Edge, which the consultation document suggests is one of the most sustainable existing settlements in the district. We recognise the very particular physical and other limitations on the growth of the town.

Kingswood to the South already hosts secondary education, and as the consultation document points out, it is a net importer of labour. It also lies on the existing public transport corridor leading towards Charfield and Thornbury, which also passes some significant local employment sites not least the major Renishaw campus just East of the County boundary. We anticipate further improvements in the bus service in this corridor, particularly should large-scale development ultimately take place within South Gloucestershire, either at Buckover or Charfield, or both. Stagecoach considers that there is short term potential for development on the Stroud side of the County boundary to catalyse and take advantage of a substantial improvement in public transport frequency and quality, subject to appropriate pump priming funding being released, and the direction of such development as is required to meet the housing needs of this area being as far as possible adjacent to the line of the direct bus route.

We see no alternative credible options for sustainable development within the Wootton cluster except at Kingswood. The consultation document seems to agree, and proposes two options for development in Kingswood as the only preferred options for allocation. However, only one of these

is apparently to be taken forward which suggests that both are currently considered to be of broadly equal merit, though neither is on the main Charfield Road, and thus able to take best advantage of such improvements. We note other sites have been promoted North and South of the Charfield Road that do. We see no compelling environmental or other constraints that would suggest this direction of growth is inappropriate. That are therefore would recommend that the capacity of Kingswood to be the focus of a quantum of growth sufficient to meet the housing needs of the southernmost part of the district, including affordable housing, should be thoroughly tested, alongside the deliverability of significantly improved local facilities and convenience retail.

Question 4.2d

Do you support our approach to addressing Gloucester's housing needs?

Stagecoach has been consistent in its advice to planning authorities to the North, that further development to meet the city's needs could be accommodated within Stroud district at least as well as within Tewkesbury Borough. These opportunities were examined to some extent through the Joint Core Strategy, and from the evidence presented to the Inspector, she made a clear recommendation that land within Stroud District should be brought forward, to sustainably accommodate needs that could not be met within the city's boundary. Two specific sites were indicated, at Hardwicke Green and at Whaddon, both of which have been broadly indicated in both this consultation and the previous one, to meet the city's needs.

We struggle to see that any realistic alternative exists either within the city, or within other adjoining authorities, to meet the already significant deficit in providing for Gloucester's housing needs. This is not merely a matter of backfilling the overall quantum needed by 2031, which the JCS has been unable to provide, but also an increasing deficit within the identifiable pipeline of sites deliverable within five years.

We are therefore somewhat surprised that this consultation document continues to treat the problem as if it does not necessarily exist. As such then, the matter is left to be re-examined essentially from first principles by the Joint Core Strategy authorities, despite the fact that there recently adopted plan clearly cannot deliver against the requirement today or over the plan period. Work on a review of the JCS has only just commenced, and accordingly, "the answer" to revisiting this question will not be available in a definitive form for at least two years. During this period, we consider that the evidence points strongly to the problem getting significantly worse.

Question 4.2e

Do you support an alternative approach to addressing Gloucester's housing needs?

We believe that the evidence already before both the Councils, makes it appropriate to allocate at least one strategic site within Stroud District at this stage.

Of the two sites at Hardwicke Green and at Whaddon, the former is clearly less constrained in virtually all respects, including the ability for it to take advantage of existing public transport, as we had made clear previously to the JCS Examination. This is because Hardwicke Green is already directly served by regular public transport, and because the developable area relates much better to

both existing bus routes, and future potential extensions or diversions of the adjoining network. It is also much easier to serve initial phases of development with buses than the site at Whaddon. Finally it is clear from the transport evidence base submitted in support of the JCS in May 2017, that the St Barnabas roundabout operates at or above saturation, for much of the day. There is no clearly identifiable mitigation for additional traffic that substantial further development at Whaddon would generate, apart from a substantial mode shift towards public transport from both existing highway users along the Stroud Road corridor, and new residents. While we are keen to look at this further with the promoters, it has to be said that arriving at a robust package of measures is likely to be relatively complex. This being the case, we would strongly urge Stroud District Council to signal much more clearly at this stage the intent to allocate Hardwicke Green, to allow sufficient certainty for proposals to be worked up in more detail, in advance of the current review proceeding to Examination. This will be essential to supply participants, including the Inspectorate, with the evidence of achievability and deliverability of the site.

Hardwicke Green is understood to have the capacity of about 1350 dwellings. This would address both short-term issues with five year supply, while also making a substantial contribution to the net undersupply identifiable in the current JCS. We would support the Council testing rigorously how far Whaddon represents the most sustainable option for any additional quantum required, against other credible options. However, we think these are likely to be very limited indeed.

In fact, one of the only options beyond those identified is likely to lie within the district at Whitminster, which is sufficiently close to Gloucester to credibly address the city's needs, as well as that arising from within the district itself. We have signalled to the JCS authorities that there may be merit in looking West of the Severn, in the vicinity of Highnam within Tewkesbury Borough, which is a broadly equivalent distance from the current edge of the city. However, a wide range of constraints on the Western approaches to the city may well make this area of search fruitless.

Question 4.3a

Are any of the settlements in the wrong tier and, if so, for what reason?

Stagecoach believes that the settlement hierarchy set out within the consultation document is fit for purpose.

Question 4.3b

Do you support the proposed approach to managing development at small Tier 4 and 5 settlements by including them within the hierarchy and defining Settlement Development Limits? Or do you support an alternative approach of simply treating them as 'open countryside'? What are the pros and cons of either approach?

Stagecoach strongly of the view that development at small Tier 4 and 5 settlements should be very strictly controlled indeed, to prevent any exacerbation of car dependency through a dispersed pattern of growth within the district. This is entirely in conformity with both the emerging development strategy for the plan, and national policy.

We have no clear view as to how this should be achieved in policy terms. There is probably some merit to defining settlement limits in policy, especially if there are clear opportunities to provide for a handful of new homes to meet specific local needs in each. We would suggest that under 10 dwellings in total should be a guide to how far any such settlements could develop. This approach would also be compatible with a wider policy suite that allowed for greater flexibility for development in the largest, most sustainable settlements.

Question 4.3c

Do you support the idea that the Local Plan should seek to manage the cumulative impacts of growth on individual settlements? How should we develop a policy framework to achieve this?

Throughout history, settlements have experienced differential levels of growth, arising from a variety of opportunities and constraints. Since the introduction of the national planning system, this has remained the case, though it is now the planning policy to determine what levels of growth are appropriate having regard to a full range of factors which must be considered. We do not see that it is the proper role of the planning system to “close off” potential opportunities for sustainable development solely because the existing settlement size is smaller than some others. Given the position that Stroud is in, where the largest settlements clearly cannot grow commensurate with their sustainability and size, it is almost certainly the case that some smaller settlements are likely to present some of the best opportunities to accommodate the development requirements of the district in a manner that best achieves the overarching objectives of the plan.

However, it is also clear that development should be concentrated closest to where employment services and facilities can be accessed by sustainable modes. This means that most settlements in Tiers 3b and below will not represent appropriate locations for significant development, and this is already clear from the proposals in the consultation document.

We consider that a plan-led approach to identifying the settlements where capacity exists to meet the growth needs of the area sustainably is obviously the right one. This may require the designation of one or two “growth foci” that may represent planned expansions of a larger village.

We see no clear evidence that the Council has to date properly considered how far this may represent a more appropriate solution than entirely new settlements, and we consider this a significant weakness in the evidence base behind the plan strategy. Expansion of an existing settlement on a planned basis is much more likely to lead to the more cost-effective and early delivery of key social and physical infrastructure, and is also likely to catalyse significant improvements in local services for existing residents. In certain cases, such growth focus is also likely to have a wider benefit in improving access to services across the wider area, in a rural district such as Stroud.

Where such opportunities exist, it may be more appropriate for Neighbourhood Plans to steer the shaping of proposals in more detail, once broad principles have been established, including the overall quantum should be accommodated.

Question 4.4a

Do you support the emerging Strategy's approach towards maintaining settlement development limits?

Stagecoach does not entirely support the emerging Strategy's approach towards maintaining settlement development limits. As we have previously said, we believe it is likely to prove to be unduly restrictive and inflexible. Should it be the case that housing delivery falls behind that required, and additional sites are required and promoted beyond the plan led system, we do not see much evidence that such defined limits would in fact prove to be very effective. Sustainable options beyond the identified Settlement Limits would no doubt succeed at appeal.

Question 4.4b

Or do you support an alternative approach?

Stagecoach believes that the hybrid approach set out in the consultation document, removing them from the largest settlements, and potentially any appropriate growth foci to steer patterns of growth more closely in line with the emerging spatial strategy but retaining an appropriate level of flexibility so that the plan can respond swiftly to changing circumstances. This is required by NPPF. There is already a comprehensive suite of policy designations and physical constraints covering the District to the extent that it is highly unlikely that this approach would serve to lead to relatively unconstrained urban sprawl.

Question 4.4c

Do you support the proposals to allow some limited development beyond settlement development limits?

If it is considered appropriate to maintain settlement development limits, and extend these to the smaller settlements, it would appear to defeat the primary purpose of the policy to allow limited development of any kind beyond them. There may be merit in devolving the decision on the precise boundaries of settlement development limits to Neighbourhood Plans, where very small scale opportunities are believed to exist by local communities to provide small numbers of homes, as we described elsewhere.

Question 4.4d

Or do you support an alternative approach?

Please see our response to question 4.4 a.

Question 4.4e

Do you support the specific changes to existing settlement development limits that are set out in Appendix A? (Please clearly specify which settlement(s) your comment(s) relate to, and use the map's boundary change reference where relevant).

Stagecoach has no specific comments to make in response to this question.

Question 4.4f

Do you support any other changes to settlement development limits, not listed?

Stagecoach has no specific comments to make in response to this question.

Question 5.0a

Do you support the proposed mini-visions for your area(s)? (Please be clear and specific about which of the 8 mini-visions your comment(s) relate to).

Stroud Valleys

Cam and Dursley

Stonehouse Cluster

Gloucester Fringe

Berkeley Cluster

Severn Vale

Wootton Cluster

Cotswold Cluster

Question 5.0b

Would you like to propose alternative wording for any of the mini-visions? (Please be clear and specific about which of the 8 mini-visions your comment(s) relate to).

We set out below as suggestions as to how the mini visions might be adjusted to ensure that a clear transport narrative is signalled consistently throughout the final plan. Our amendments are highlighted in bold.

Stroud Valleys

*It will act as both focal point and gateway for surrounding communities and visitors, with improving public transport links **within as well as to and from** to the wider rural area.*

Cam and Dursley

*Together, Cam and Dursley provide **the principal** focus for jobs and services in the southern part of the District. Development will bring new economic vitality, with more high technology, start-ups and light industrial businesses using the area's skilled, trained workforce. Dursley town centre will continue to provide the main shopping and leisure focus, with environmental enhancements and additional facilities helping to maintain and increase its vitality. Facilities and services will be enhanced at Cam and Dursley railway station. As a sustainable place to live and work, growth here will support local services, improved **public transport and other** infrastructure and provide for the social and economic wellbeing of the wider locality.*

Stonehouse Cluster

*Stonehouse is one of the District's **main concentrations of** employment ~~hotspots~~ and, with its good ~~rail and~~ road **and public transport** links, it is well placed for future growth.*

Development to the west of Stonehouse will expand the existing Oldends/Stroudwater employment area, with attendant transport and infrastructure improvements – including improved **sustainable transport** links to the town centre **and neighbouring towns and villages** providing **attractive convenient travel options, and substantially reducing car dependency**. ~~Opportunities for all to make use of pleasant and safe ‘green links’ on foot or cycle.~~ This will be a sustainable workplace destination for the District, as well as a vibrant new community, served by its own local centre.

Gloucester Fringe

Hardwicke’s village character and sense of community will be preserved, while the **wider area** ~~to its east~~ sees continued housing and employment growth, and plays an ever more important role as a ‘gateway’ to Gloucester. High quality design and improvements to transport and infrastructure will enhance the environment and quality of life for those living or working close to here, as well as improving the experience of those passing through.

Hunts Grove **and Hardwicke Green** will **each** grow into a sustainable new community with a strong sense of identity, served by its own “village centre” and providing easy and convenient access **by sustainable modes** to nearby jobs and **higher level services**.

Berkeley Cluster

“A new community ~~communities at Sharpness and~~ at Wisloe Green will help to meet the housing and employment needs of the District, whilst delivering a step change in services and facilities available to the local area. Following Garden City principles, the mix of uses, design quality and an accessible layout within a green setting will deliver a truly sustainable pattern of living for new and existing local residents **reinforcing and catalysing a step change in patterns of public transport provision in the wider area.**”

Berkeley town will continue in its historic role as a service centre for rural communities around it, although it is recognised that it cannot compete with larger towns within or outside the District for many goods or services. Instead, its local role will be bolstered through small scale growth to meet locally identified needs, benefitting from improved transport links to elsewhere, delivered by the new community at Sharpness.”

Severn Vale

Whilst maintaining ~~and improving~~ public transport **as far as possible, with potential to take advantage of any improvements provided on the A38**, accessibility and services will remain key aims for these communities, this part of the District will experience no ‘strategic’ growth or development during the plan period except **that identifiable within a suitable growth focus on the A38 corridor.**

If this is identifiable it will help to meet the housing and employment needs of the District, whilst delivering a step change in services and facilities available to the local area. Following Garden City principles, the mix of uses, design quality and an accessible layout within a green setting will deliver a truly sustainable pattern of living for new and existing local residents reinforcing and catalysing a step change in patterns of public transport provision in the wider area.

Wootton Cluster

*Lying at the southernmost tip of the District, the parishes around Wotton-Under-Edge naturally look southwards to Bristol and South Gloucestershire for many of their needs. A key aim for the plan period will be to improve opportunities for people to access jobs, services and facilities without having to travel long distances, but to improve public transport access to those services that cannot be met locally. **The identified development needs within this area will therefore be directed to Kingswood, to take advantage of and help reinforce the delivery of this sustainable movement corridor.** The south of the District will benefit from the growth of employment at Cam, as well as the on-going revitalisation of Dursley and its town centre.*

Cotswold Cluster

*At the heart of the area lies Painswick, “the Queen of the Cotswolds”, which will continue to play an ~~important~~ **significant** role as a **local** service provider for surrounding communities, as well as drawing in visitors. Some **organic** growth **on a small scale** will ~~reflect its role within the area, and will help to meet local housing needs. Maintain and improve the vitality of the town centre and support local services.~~*

Question 5.0c

Do you support the identified key issues and priorities for action for your area(s)? (Please be clear and specific about which of the 8 parish clusters your comment(s) relate to).

While Stagecoach broadly supports the identified key issues and priorities that each part of the District, we have some specific concerns that they do not fully reflect the opportunities identifiable to achieve the necessary step change in use of walking, cycling and public transport. We set out our suggestions in the response to the following question in the consultation document.

Question 5.0d

Are there other important issues and priorities you would like to highlight? (Please be clear and specific about which of the 8 parish clusters your comment(s) relate to).

Stroud Valleys

Stagecoach support strongly the priority expressed of “Achieving a better public transport system”.

As the largest cluster of population within the district, and with 40% of residents lying along clear corridors, opportunities for sustainable transport, and public transport in particular are clearly

greatest can have the greatest impact on reducing car dependence which remains high. For this to be realised, it is essential that bus services can take advantage of bus priority measures given the chronic congestion that affects a great deal of this part of the district, as we have highlighted previously.

Cam and Dursley

Stagecoach strongly supports the identified objectives of

- *Reducing car-borne traffic levels and delivering public transport improvements*
- *Enhancing rail facilities at Cam and Dursley station*

It is essential that the plan follows through on this and does not neglect the much more cost-effective and scalably deliverable impacts that improvements in bus service frequency and connectivity are likely to be able to produce within both the short and longer terms.

Stonehouse Cluster

Stagecoach welcomes the plan's recognition that significant potential improvements to public transport can and must be achieved in the Stonehouse cluster. We support the identified priorities including:

- *Delivering a new station on the Bristol-Birmingham main line at Bristol Road, Stonehouse*
- *Designing safe cycle routes and achieving **better higher levels of public transport frequency and connectivity***
- *Reducing A419 road congestion and travel to work out-commuting*
- *Maintaining and improving the vitality of Stonehouse town centre*

Gloucester Fringe

We object to the identified strategic priorities for this area which fail to pick up on the significant issues and opportunities that are presented for sustainable transport in this area. There is no recognition of existing transport challenges including serious congestion at Cross Keys, and the potential opportunities to further boost sustainable transport associated with both committed development at Hunts Grove and potential sustainable development at Hardwicke Green.

Berkeley Cluster

We note that the plan has as one objective *"Improving transport links with towns and villages in South Gloucestershire and to Bristol beyond"*.

The plan does not set out any deliverable means by which the development strategy could achieve this objective. As we set out earlier, and have made clear on previous responses, the economics of passenger transport provision by either road or rail will make it exceptionally difficult if not impossible to provide significantly enhanced levels of public transport connectivity from this cluster towards relatively distant destinations in South Gloucestershire and beyond in Bristol.

Severn Vale

No objectives have been identified in the plan for identifying improving the availability and accessibility of services by sustainable modes. This represents a complete mismatch with the mini-vision for this cluster.

That said, looking carefully at the opportunities the development at Whitminster could credibly achieve that vision through a careful approach to expansion taking advantage of the existing, committed and likely further future PT enhancements.

Wootton Cluster

Stagecoach welcomes that the plan is setting out with the key priority of:

“Designing safe walking and cycle routes and achieving a better public transport system.”

It is far from clear how the development strategy intends to achieve this goal. As we set out elsewhere, we believe that identifying Kingswood as a location to meet the housing needs of the area represents the most obvious opportunity to actively manage patterns of development to take advantage of the opportunities for sustainable transport, walking and cycling, and meet the wider transport objectives of national policy.

Cotswold Cluster

Stagecoach recognises that there are particular transport needs arising from the way the demographic structure of the Cotswolds is evolving, and that these present significant challenges. We note that the plan proposes as a key priority for this area *“Improving community transport schemes for use by an increasingly elderly population.”*

We do not see this as being something that the planning system can realistically achieve. Rather, close dialogue between the Council, the County as Local Transport Authority, and the third sector is more likely to suggest more appropriate means to achieve this goal.

Providing high-quality regular bus services ought to be considered equally important to maintaining rural accessibility, and an appropriate approach to the location of development is certainly material in supporting this outcome.

Question 5.1a

Assuming some growth is desirable, have we identified the best site(s) at each town and village? (Please clearly specify which settlement(s) your comment(s) relate to, and use the site reference numbers shown on the map, where relevant).

Brimscombe

PS01 Brimscombe Mill: 40 dwellings plus employment uses. (This is an existing site allocation in the current Local Plan: SA1d).

PS02 Brimscombe Port: 150 dwellings, canal related tourism and employment uses. (This is an existing site allocation in the current Local Plan: SA1e).

Stagecoach considers that it is logical and appropriate to carry forward these existing Local Plan allocations. However, it has to be said that both of these are far from ideally situated with respect to the availability of high quality public transport choices, quite apart from the other technical challenges that have no doubt mitigated against the being brought forward to date. At the very least, we would expect that these sites should not be expected to contribute towards the short-term housing land supply, unless very clear evidence to the contrary has been presented to the Council.

PS03 Land at Hope Mill (up to 40 dwellings and open space).

Stagecoach supports the allocation of land at Hope Mill, though many of the comments we make for the other sites in Brimscombe would probably be applicable.

Minchinhampton

PS04 South of Cirencester Road: Up to 50 self-build / custom-build dwellings.

PS05 East of Tobacconist Road: Up to 100 dwellings, doctors surgery / community uses and open space.

Stagecoach supports the identification of both these new sites for allocation. The village of Minchinhampton lies on a regular bus route between Stroud and Cirencester, both of which can be reached within a journey time that is competitive with driving. We see clear potential to further enhance the service, which is currently financially supported to some extent by Gloucestershire County Council. The main justification of this would arise from incorporating a larger number of education-related flows onto peak journeys, but there is also a clear need for a better direct public transport link between two of the County's largest centres of population, services and employment. Minchinhampton lies directly on this corridor, and would directly benefit from, and help sustain such improvements.

Nailsworth

PS06 The New Lawn, Nailsworth: Up to 80 dwellings and community uses – subject to relocation of football ground.

PS07 North of Nymphsfield Road / Nortonwood Junction: 25 dwellings and open space.

Stagecoach supports the identification of the sites for housing growth. We recognise the opportunities to identify suitable sites in this part of the District are very limited. We cannot identify any other more appropriate potential allocations.

Stroud

PS10 Railway land / car parks, Cheapside: up to 75 dwellings and town centre uses.

PS11 Merrywalks Arches, Merrywalks: up to 25 dwellings and town centre uses.

PS12 Police station / Magistrates court, Parliament Street: up to 45 dwellings and town centre uses.

PS13 Central river / canal corridor: around 120 dwellings, canal related tourism and employment uses.

Stagecoach recognises the strong logic behind each of the proposed allocations. It is likely in our view that further evidence about the deliverability and capacity of each site will come to light while the plan strategy develops further. It is essential that the plan makes provision for the consolidation and improvement of Stroud town centre as a venue, as the most accessible settlement in the District by sustainable modes.

We cannot identify any more appropriate sites for town centre uses or to meet the wider development requirements of the District.

Kings Stanley

PS14 Stanley Mills: an existing planning permission for 146 dwellings

PS15 North of Kings Stanley Primary School: 15 dwellings plus open space

We support the identification of the sites preferred in the consultation document. The village already benefits from an hourly commercial bus service, which provides some level of travel choice to residents offering links to both Stroud and Stonehouse. We also recognise that there are relatively few opportunities remaining for further growth in the village.

Leonard Stanley

PS16 South of Leonard Stanley Primary School: up to 30 dwellings plus open space.

As with Kings Stanley, we support the principle of limited further growth. Likewise, we cannot identify any obvious opportunities for the development, nor do we believe that the scale of development appropriate in the Stanleys should rise beyond those preferred sites identified in the consultation document.

Stonehouse

PS17 Magpies site, Oldends Lane: 10 dwellings, community uses and open space.

PS18 Land to rear of Regent Street: up to 20 dwellings plus open space.

Stagecoach is of the broad view that the local plan should not seek to try to identify sites of under 20 dwellings scope, as these might better be considered to represent urban capacity, or at the very least can be covered by a policy acknowledgement that small scale windfall opportunities are likely to come forward within settlements.

PS19 North/northwest of Stonehouse:

- a) up to 500 dwellings, plus open space and 5 ha employment**
- b) up to 150 dwellings and open space.**

We strongly support the identification of further development to consolidate the existing strategic allocation West of Stonehouse (Great Oldbury). The existing disposition of land uses and the access and movement framework within the current consent makes it possible to deliver public transport

close to, and if necessary within land adjoining the site to the North. We understand that this could accommodate substantially larger numbers than the consultation document proposes for either option, but irrespective, it clearly makes sense to consolidate the existing committed development in a place that is already accepted to be highly sustainable. This suggests an allocation of at least 500 new homes.

A larger quantum of development will by its nature support a commercial delivery of higher levels of public transport frequency, further boosting the attractiveness and relevance of the service, and facilitating to the potential to achieve higher levels of mode share for bus than has typically been achieved elsewhere in the District to date.

PS20 M5 Junction 13:

- a) 10 ha employment, canal, open space**
- b) 18 ha sports stadium and community uses.**

Stagecoach supports the identification of this area for both employment, community and stadium uses. The site clearly lies in a highly accessible location that also has the virtue of being able to take advantage of both existing public transport links, those scheduled to take effect through the delivery of committed development to the East, and further opportunities that will be catalysed by a strategic allocation of this kind on a clear public transport spine. The best opportunities to achieve the highest possible uptake of bus use will always be secured by managing patterns of growth along identifiable high quality public transport corridors.

We see no other more appropriate sites to accommodate these uses East of the M4. However, we do believe that examination of options immediately West of the M5 may well offer opportunities to secure sustainable development in a way that achieves both the overall objectives and the local priorities of the plan.

Cam and Dursley

PS21 Land adjacent to Tiltdown House: up to 15 dwellings.

This site, while small, is entirely rational as an allocation and is supported.

PS22 Coaley Junction: 40 dwellings plus open space.

We are aware that this site is currently the subject of a live planning application. Bringing the site forward clearly helps to consolidate a larger area of development at a strategic scale identified within the current adopted Local Plan.

However, if the railway station is to better serve increased level of local demand, alongside other improvements to public transport including improved interchange with high frequency bus services, land will need to be identified in this area for substantial station enhancements. It is important that early work is undertaken to ensure that all the opportunities in the immediate vicinity are brought together in such a manner that these are facilitated and not precluded.

PS23 Rear of 4-60 Draycott: 1 ha employment uses.

While this represents a small site, it make sense to consolidate employment uses here, in a sustainable location that will be well -related to both existing, committed, and potential future employment.

Notwithstanding this, it is important to ensure that all the opportunities to provide enhanced railway station facilities, including access and interchange, are fully explored. The site is likely to offer some significant potential opportunities in this regard, not least because it is immediately accessible from the main road and public transport corridor.

PS24 West of Draycott: up to 700 dwellings plus open space.

Within the Cam and Dursley area, the Draycott locality already benefits from the highest level of public transport accessibility, in many ways exceeding that available in the town centre of Dursley. Identifying land in this area to meet housing needs on a strategic scale is therefore entirely appropriate, given that other constraints appear to be relatively limited. The entire area proposed for allocation lies within convenient reach of the existing bus corridor along the A4135 and the focus should be on ensuring that higher frequencies are offered, with convenient pedestrian access from all parts of the development to improved infrastructure along the existing route.

There is a very obvious synergy between this preferred option, and the committed development in the local plan North East of Cam. When the proposed new settlement at Wisloe Green beyond Draycott is added to this, there is very clear potential to quite substantially strengthen both the frequency and overall quality of public transport in this corridor, also taking advantage of interchange possibilities for longer distance journeys at Cam and Dursley railway station.

We would nevertheless advise that a great deal of care needs to be taken to ensure that seamless bus routes are provided linking between existing committed and proposed development, where necessary running through sites where this is demonstrably improves the directness and attractiveness of the service, for the largest number of existing and future residents.

PS25 East of River Cam: up to 180 dwellings plus open space.

This potential allocation represents a compact form of development, within close proximity of existing bus routes and could help contribute to creating the high level of demand required to see the frequency of the services improve, supporting a key priority of the plan for this area. However for this to be achieved, high quality pedestrian links will need to be made cross the river, through existing development towards the Tesco superstore and the main road beyond. It is far from immediately apparent how easy or practical such links will be to effect.

Much more needs to be understood about the potential access and movement strategy in support of this potential allocation, though we recognise it has many merits.

CAM015
CAM016

Both of these sites, which have been omitted from the plan, might warrant further investigation has potential options to meet housing needs in the southern half of the District, especially if they can be properly integrated with the existing strategic allocation immediately to the East.

It will be necessary to consolidate patterns of development strongly, around existing and potential public transport links, if existing levels of car dependence are not to be perpetuated through the plan strategy. There are relatively few such opportunities available within the plan area, and this, being close to the railway station and immediately adjoining existing planning commitments, represents an opportunity that we consider needs to be looked at in much more detail. Among other things, both would represent a demonstrably more sustainable, achievable and deliverable option and an entirely new settlement at Sharpness, far distant from any existing public transport links and major travel destinations.

PS26 Land off Acacia Drive / Oak Drive, Kingshill: up to 15 dwellings.

PS27 1-25 Long Street: town centre uses.

PS28 The Old Dairy / Land off Prospect Place: 10 dwellings and town centre uses.

PS29 North of Ganzell Lane: 80 dwellings plus open space.

As we have outlined previously, we do not see that the plan should seek to identify small scale sites at this stage, of under 20 dwellings scope. However, we support the identification of all the preferred sites outlined above. It is important that sites are identified in Dursley town centre to allow its central place role to be consolidated. We cannot identify any other better sites for this purpose, which is not to say that they may not exist.

PS30 Hunts Grove extension: This existing site allocation in the current Local Plan (SA4) will deliver 750 dwellings, community uses and open space.

Stagecoach supports the continued retention of the allocation on land South of Haresfield Lane, in the existing Local Plan, which will act as an extension to the current commitment At Hunts Grove. Growth in this area has long been recognised as representing among the most appropriate and sustainable a direction in which to manage growth in this area, and in particular, to meet needs arising within the city of Gloucester. We agree that nothing has changed to suggest that this no longer remains the case.

Indeed, we note that work has now begun to provide the major new junction on the A38 that will facilitate the main Western access into the existing commitment. This releases the delivery of the final thousand dwellings accounted for by the current planning permission.

The delivery of this junction will equally allow for the completion of the spine road that would serve both ongoing development, as well as the existing allocation. The ultimate delivery of a bus service at the highest possible frequency along this road would greatly benefit from hinterland of the service being maximised, and no doubt this also applies to the delivery of other infrastructure and services. It also takes advantage of the substantial investment in the new A38 junction, while other off-site highways improvements are already anticipated that can satisfactorily mitigate the traffic

impacts on the local and national highways networks. It is important that work is undertaken at the earliest possible opportunity to ensure that bus priority forms part of these improvements, given existing conditions on the network in this area.

We confirm that we are in discussions with the developer and their client team, and Gloucestershire County Council to ensure that high quality public transport options are offered to Hunts Grove residents at the earliest possible opportunity.

PS31 Quedgeley East: This existing site allocation in the current Local Plan (SA4a) will deliver 13 ha of employment.

We agree that this site warrants retention as an allocation in the local plan, as it supports the overall plan vision and strategy relatively well. It is directly served on a public transport corridor, which we anticipate remaining in place in the longer term in some form or another, between Stroud Stonehouse and Gloucester.

PS32 South of M5 / J12: 5 ha employment.

This site lies very considerably off-line of existing public transport corridor. Ensuring that good sustainable travel choices are provided depends largely on how far connectivity can be achieved to the B4006 through the existing allocation (PS31) and to Haresfield Lane, even if the latter link is restricted to sustainable modes only. We have previously indicated that should this be possible the site might well warrant allocation.

HAR013

We note that this site is currently the subject of a live planning application for housing. The principle of development on this site is already accepted.

We are agnostic as to whether the site comes forward in line with the current allocation, or for residential uses, though we also would point out that immediately available public transport options are very limited, and are likely not to appreciably improve in the near future, if at all. In part this arises from the fact that the existing highway network serving the site suffers from a lack of connectivity to the South, and very high levels of on-screen parking. Should these matters be addressed then both the current uses and any future development on the site may well benefit from a better range of public transport options.

Upton St Leonards

UPT002

UPT003

UPT004

UPT012

We note that the strategy for the Gloucester fringe does not include any allocations in Upton St Leonards. The village clearly functions in many respects as a part of the wider Gloucester urban area, and accordingly it is also served relatively well by public transport for settlement of its size. We note a number of sites referred to above have been proposed for development, and certainly, boosting demand for the existing bus services would assist in their longer-term viability, which is currently rather marginal. However, all of the sites lie relatively long-distance from the current bus route, we would tend to agree with the view that better options exist to meet unmet needs for housing arising from the city of Gloucester.

G1 South of Hardwicke: may have potential to contribute towards meeting Gloucester's unmet housing needs, subject to being considered against all reasonable alternatives on the edge of Gloucester.

Stagecoach has long been of the view that Hardwicke Green represents one of the demonstrably most sustainable locations for development to meet needs arising in Gloucester city. These needs are immediate, and pressing.

There is a long planning history to the site, stretching back prior to the existing local plan. Over the last 20 or so years, and certainly over the last three or four years, there seems no evidence to suggest that this site is any less sustainable now than it was when it was considered against Hunts Grove, and discounted subsequent to detailed examination essentially because, without a housebuilder involved in the promotion, it was considered less deliverable than Hunts Grove. Any doubts about the deliverability of this site surely have now been addressed, not least because an initial phase is the subject of a current live planning application by a national housebuilder.

We continue to be fully engaged with the promoter and the client team to ensure that the opportunities for sustainable transport of all kinds are identified and fully taken up. We believe that this site is uniquely positioned to sustainably meet Gloucester city's housing needs in a sustainable location, both in the short and longer term, and we do not see a deliverable option existing of like quality either elsewhere within Stroud District, or within another authority.

G2 Land at Whaddon: may have potential to contribute towards meeting Gloucester's unmet housing needs, subject to being considered against all reasonable alternatives on the edge of Gloucester.

We have previously signalled to the JCS examination that we believe potential exists to integrate development on land at Whaddon relatively well into the Gloucester city bus network, subject to addressing the difficult problem of congestion on the Stroud Road approaches to the St Barnabas roundabout, and the delivery of a seamless bus spine route from Grange Rd, South into and through the potential development area.

Since that time, we have had some initial discussions as to how far this can be achieved, given that land is under promotion by more than one interest. These discussions have not progressed in the last year. We are however aware that a number of constraints exist that will quite heavily affect the public transport strategy for this site, particularly in the early phases which really would need to

depend on the existing half hourly interurban service 63 running along the eastern edge of the site. Relatively few dwellings are likely to be sited within easy walking distance of this route, and as such a real risk exists that a meaningful public transport choice will not be deliverable until relatively late in the development life-cycle.

We will continue to work closely with the promoters, their client teams and with the councils to fully explore the opportunity for sustainable development that exists at Whaddon.

Berkeley

PS33 Northwest of Berkeley: up to 120 dwellings plus open space.

Berkeley is the clear service hub the settlements in this part of the District. Accordingly, it is appropriate to seek to meet local needs here, on a scale commensurate with the level of local service provision. Local public transport frequencies and journey times are currently insufficient to make this a relevant option for any other than those who have no access to alternatives, the service is currently supported financially by Gloucestershire County Council.

We consider the current preferred site to represent among the best of the options to meet locally arising housing needs and support its identification.

Sharpness

Stagecoach objects to the identification of a strategic quantum of development at Sharpness, as it has previously made plain to the Council.

We note that the current consultation document retains proposals both to retain a substantial existing allocation (SA5) and add further allocations totalling approaching 2500 dwellings and associated services and employment, in a locality that is simply miles from any existing credible public transport provision, whether to make local journeys or those further afield.

Reiterating our previous comments, sheer scale will not in any way overcome the tyranny that this remoteness presents to the delivery of credible, commercially sustainable public transport services by any mode that can be identified at this time. To our mind, the only merit of this area is that it is relatively unconstrained in landscape and other policy designations, and allows the assignment of the largest possible proportion of the local plan housing quantum to a location that has the least obvious direct impact on the existing population.

Providing even a regular bus service, on a frequency and offer nature likely to present a reasonably credible sustainable transport choice towards either Cam and Dursley, or towards Thornbury and the Bristol Northern Fringe, would represent an annualised operating cost that would dwarf the revenue potential achievable from all the combined developments, even if quite heroic assumptions about bus mode share were to be applied to the calculations. No evidence has been advanced as to the deliverability of any kind of public transport service that we can see. It ought to be perfectly evident

that the risks and costs attendant upon providing a rail-based solution represent something that stretches credibility to breaking point.

We believe that the Council should be able to identify a range of much preferable alternatives and much more sustainable settlements and on greatly more appropriate sites, including a potential new settlement at Wisloe Green.

PS34 Sharpness Docks: This existing site allocation in the current Local Plan (SA5) will deliver up to 300 dwellings, 7 ha employment land, tourism, leisure, community uses and open space.

We understand the rationale for the current local plan allocation at Sharpness Docks. Relative to the size and sustainability of the existing settlement, and the range of credible public transport choices available, the current allocation surely must be considered the upper end of what is appropriate. We also note that there has been no clear sign that this site will move forward to delivery in the foreseeable future.

While there may be a number of other reasons that sustain the continuing allocation of this site, the potential to secure and sustain meaningful public transport choice is certainly not one of them. Nor do we see a compelling need to allocate this quantum of development over and above that identified at Berkeley to meet housing needs arising in the immediate locality. At best then, the site wants retention as a potential additional source of housing and employment land supply, to assist the viability of wider aspirations to maximise the leisure and heritage opportunity in the settlement.

PS35 Land at Focus School, Wanswell: Up to 70 dwellings, community uses and open space.

Our wider comments regarding Sharpness clearly apply to the site. We are not clear the basis on which allocation of this land supports the overall objectives and the local policy priorities of the plan, which rather tends to support a highly car-dependent form of development.

PS36 South and east of Newtown and Sharpness: Up to 2,400 dwellings by year 2040, 10 ha employment, retail, community uses and open space.

We have already made quite clear representations to the Council regarding the inappropriateness of allocating a large-scale new settlement at Sharpness. We have reiterated these within this document at a number of points.

We do not believe, as a major public transport operator, not only of buses but also light rail and heavy rail services, that the promoters have advanced any substantive evidence to demonstrate that this location will not be entirely car-dependent. Whatever the other material matters bearing on the suitability, achievability and deliverability of this proposal (and no doubt, there are a great many) it is clear to us that relying on this site represents neither an appropriate strategy nor a deliverable one.

Should the need arise, we would be quite prepared to work through in some detail the economic constraints on public transport provision that apply not only to Sharpness, but any substantial

development that lies a great distance from key destinations and is not on current or potential direct public transport corridor.

Wisloe

PS37 Land at Wisloe: At least 1,500 dwellings by year 2040, 5 ha employment land, retail, community uses and open space.

Stagecoach has previously made clear that it believes an important opportunity exists to greatly improve north-south public transport services on the A38 corridor. Sensitively located and designed new settlements on the A38 would offer the means to catalyse and facilitate such an opportunity.

We therefore welcome strongly the approach made to the Council by the landowners at Wisloe Green, which uniquely has in its favour its relative proximity to the existing railway station, and the ability to help take advantage of any improvements to bus services to the South, towards Thornbury and Bristol, as well as to the North West where bus services are currently much better established albeit not provided at very high frequencies.

We strongly agree with the conclusion expressed in the consultation document that bringing forward proposals at Wisloe Green will require consideration as part of a wider strategy including adjoining settlements to ensure that a rational relationship is achieved between the new settlement and existing ones.

It will be extremely important to work closely with the promoters of the site and both councils to ensure that the ultimate proposals for the site, including the policy suite in support of it, ensure that the opportunities for improved bus and coach services are facilitated to the greatest possible extent. It is certain that these will need a significant degree of pump priming, to ensure that they are available sufficiently early in the development programme to maximise uptake. This is likely to **require** very careful attention not only to bus access and circulation within the site, but the way in which the synergies with other emerging allocations at Draycott and Cam to the South and East, and West of Stonehouse to the North, are fully realised.

We suspect that parcels that lie outside of the proposed preferred site could be incorporated within comprehensive development proposals, and this might be necessary to ensure that the opportunity presented by this development concept are fully realised. Among the key potential opportunities and constraints, would be the achievement of a high quality route through traffic, while allowing a direct bus route through the centre of the new settlement. It will be essential to secure the opportunity to provide the best possible walking and cycling links to the railway station, as well as facilitate the highest quality level of bus service provision. There may also be an opportunity to provide an alternative route between the A38/A4173 and Cam station without using Box Road, and if so this should be looked at carefully.

Whitminster

WHI001

WHI002

WHI003

WHI004

WHI005

WHI006

WHI007 Land South of Grove Lane, potential for up to 1000 dwellings and associated employment.

The quality of public transport available at Whitminster is very likely to substantially rise in the short term, as development West of Stonehouse is built out. This, alongside proximity to existing employment facilities and services at both Stonehouse and Quedgeley make the village a potential candidate to accommodate a significant level of development in our view subject to the character of the settlement, and other constraints not being unduly jeopardised. In so doing, both housing and employment could be delivered as one of the series of focused clusters of development along a single direct high quality public transport corridor between Stroud Stonehouse and Gloucester, where the additional demands arising would be likely to sustain even higher service frequencies in due course.

We note that a variety of sites have been promoted, referred to above, none of which are being taken forward as preferred options. We consider that this is a major opportunity that has been missed to explore how far housing needs for both the city of Gloucester and the district itself might be sustainably delivered.

Of the sites omitted from the consultation document WHI007 Land South of Grove Lane stands apart both by virtue of its relative size, and therefore its ability to deliver a quantum of development within a single control that is of strategic scale; and by reason of its location East of the A38, and therefore relating much less closely to the existing village. The ability of this site to provide for a new high quality public transport link between the A38 and committed development West of Stonehouse represents a particularly interesting possible opportunity.

However, the other sites that more closely relate to the existing village each and collectively look likely to offer options that are worthy of very careful consideration, particularly if a seamless efficient bus route could be provided through them, also better serving the existing dwellings in the village. We would suggest that an overarching vision incorporating all the omission sites is considered, to test the overall appropriateness as well as the detailed opportunities and constraints associated with each.

Kingswood

As we have outlined elsewhere within this response, we agree with the implicit conclusion of the District Council that this settlement is the most sustainable location within which need for housing delivery can be achieved. The question that then arises from this, is how far such need should be accommodated in Kingswood, and where. It is apparent from the number of sites that are under active promotion that a significant amount of land is identifiable that may be suitable for development, and it is important that these opportunities are fully explored having regard both to the wider objectives of the plan and meeting local priorities.

To quote the consultation document: *“A key aim for the plan period will be to improve opportunities for people to access jobs, services and facilities without having to travel long distances, but to improve public transport access to those services that cannot be met locally.”* Given that no other clear opportunities exist in more sustainable settlements within this cluster, it then follows that delivering against these objectives needs to have regard to what quantum of development might be appropriate, and necessary to help securely deliver them. We would advise that a significant quantum, certainly of over 400 new homes, is likely to be the minimum necessary to help catalyse and support the improvement of local services, not least public transport, though the evidence of clear frustrated demand in the area is found in the levels of traffic at peak times on local roads, diversion of a portion of which would account for the bulk of demands needed to make such improvements sustainable in the longer term.

The main transport corridor, including the existing regular bus services, uses the Charfield Road leaving the village to the West, and we do not see this situation changing. We have already identified the strategic opportunity presented by committed and possible further development at Charfield to start to create the critical mass of demand necessary to support much more frequent bus services in this area, which we believe would serve to substantially reduce the demand for single occupancy car journeys in the wider area, as well as from any new development that is in fact brought forward.

PS38 South of Wickwar Road: Up to 50 dwellings and open space.

OR:

PS39 South of Walk Mill Lane: Up to 50 dwellings and open space.

We would generally support both these sites being brought forward, and we do not see that there are any overriding reasons why the growth of the village should be limited to 50 dwellings. No evidence or justification for such a cap has been advanced.

KIN007 Land South of Charfield Road

KIN008 Land North of Charfield Road

Both these omission sites lie directly on the existing bus services operating between Wootton, Kingswood, Charfield and Thornbury or Yate. There appear to be no great constraints on the site capacity identifiable within the control of the respective promoters, which would be equally able to take direct advantage of, and no doubt help facilitate, a substantial uplift in bus service provision, through the application of suitable funding to help pump-prime these improvements.

We consider that these options are at least as appropriate as those already identified as preferred allocations, though we consider that looking at these as additional rather than alternative allocations is likely to be warranted.

Painswick

PS41 Washwell Fields: 20 dwellings and open space.

The site will provide nominally only a single dwelling per annum over the plan period. While we have no objection in principle to its allocation, we hardly think that it warrants being considered as a strategic allocation within this plan.

Question 6.1

Are there any other specific local studies that you believe are needed to inform the Local Plan review?

Arising from our contents above, it is likely that potential opportunities the development in both Kingswood and Whitminster are likely to warrant a more careful examination at local level, through a more focused examination of what can be achieved appropriately, in support of the local plans wider and more local objectives.

We also consider it appropriate to start to consider together with both councils, the opportunities to reinforce the bus network within the district, both in support of the local plan objectives, but also wider social and economic goals. This is like to provide a strong evidential basis for the local plan strategy, but equally can be expected to feed in to reviews of local transport and accessibility that may be undertaken by other stakeholders, including the County Council as Local Education Authority, and the NHS.

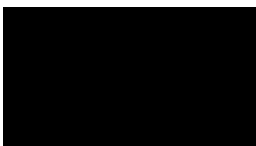
Have you any advice on the scope or content of any of these studies?

It is essential that these studies pay the fullest possible attention to the opportunities to provide for high quality public transport links, effectively serving both the existing and new development, and having regard to the fact that the services operate over a longer distance between the larger centres. It is essential that direct efficient routes are delivered, that are not compromised by the interface with building frontages or other aspect of urban structure.

Concluding Comments

We trust that the foregoing further assists the Council at arriving at an appropriate development strategy and evidence base for the Local Plan Review. In the meantime please feel free to contact me to discuss any of the points we raise further.

Yours sincerely,

A black rectangular redaction box covering the signature of the sender.

Head of Strategic Development and the Built Environment